

EXHIBIT 19



WSOU Investments LLC v. Google LLC, Nos. 20-571, 20-572, 20-573, 20-575, 20-576, 20-579, 20-580, 20-583, 20-584, 20-585 (W.D. Texas)

Jim Etheridge <jim@etheridgelaw.com>

Tue, Oct 5, 2021 at 6:55 PM

To: Mike Jones <mikejones@potterminton.com>, IPTeam <IPTeam@etheridgelaw.com>, Mark Siegmund <mark@waltfairpllc.com>

Cc: "WSOU Investments LLC v. Google LLC" <20-580@cases.warrenlex.com>, WSOU-Google <WSOU-Google@jonesday.com>, WSOU POTTER GROUP <WSOUGoogle@potterminton.com>, Jen Kash <jen@warrenlex.com>, "WSOU Investments LLC v. Google LLC" <20-583@cases.warrenlex.com>, "WSOU Investments LLC v. Google LLC" <20-585@cases.warrenlex.com>, 20-571 <20-571@cases.warrenlex.com>

Mike,

Subject to the limitations and objections in WSOU's objections to Google's Rule 30(b)(6) topics, WSOU designates the following Rule 30(b)(6) witnesses:

Stuart Shanus is designated on Topic Nos. 5, 10, 15, 18, 32, 38, 43, 45, 46, 47, 49 - 54, 57, and 68-75.

Craig Etchegoyen is designated on Topic Nos. 1, 7-9, 26-27, 35-37, 59, 61 and 67.

Mr. Hogan is available on October 19th for deposition. Mr. Garvey is checking his schedule and we expect to get you an update within 48 hours.

We object to Google's demand of 4 days of deposition for Mr. Etchegoyen and 3 days of deposition of Mr. Shanus as unreasonable and harassing.

As offered earlier, we are available to confer on Thursday from 9am-11am CT. Please confirm your willingness to meet and confer at that time.

Cordially,

Jim

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